

MINTZ & GOLD LLP

ATTORNEYS AT LAW

600 THIRD AVENUE
25TH FLOOR
NEW YORK, NEW YORK 10016

TELEPHONE (212) 696-4848

FACSIMILE (212) 696-1231

www.mintzandgold.com

SENIOR COUNSEL

JACK A. HORN
NOREEN E. COSGROVE
MATTHEW S. SEMINARA
TIMOTHY J. QUILL, JR.
JULIA B. MILNE

OF COUNSEL

HONORABLE VITO J. TITONE (*dec.*)
(NY State Court of Appeals 1985-1998)

HARVEY J. HOROWITZ (*dec.*)

HONORABLE HOWARD MILLER
(NY Appellate Div. 1999-2010 [ret.])

AMIT SONDH^{*}

ERIC M. KUTNER

NEAL M. GOLDMAN

ANDREW P. NAPOLITANO^{*}

^{*}ADMITTED TO PRACTICE ONLY BEFORE ALL
COURTS IN NEW JERSEY AND ALL FEDERAL COURTS
IN NEW YORK CITY

STEVEN W. GOLD
STEVEN G. MINTZ^{*}
ALAN KATZ
JEFFREY D. POLLACK^{*}
ELLIOT G. SAGOR
IRA LEE SORKIN
LON JACOBS
STEVEN A. SAMIDE
SCOTT A. KLEIN
TERENCE W. MCCORMICK
ROBERT B. LACHENAUER
ROGER L. STAVIS
CHARLES A. ROSS^{**}
KEVIN W. GOERING
RICHARD M. BRESLOW
KEVIN M. BROWN
ALEXANDER H. GARDNER
HEATH LORING
PETER GUIRGUIS
ANDREW R. GOTTESMAN
RYAN W. LAWLER^{*}
ADAM K. BRODY
MARIA EVA GARCIA^{*}
GABRIEL ALTMAN
ANDREW E. STECKLER
ALEX J. OTCHY^{*}
CECE M. COLE

^{*}ALSO ADMITTED IN NEW JERSEY

^{**}ALSO ADMITTED IN FLORIDA

July 8, 2020

Via ECF

Hon. Lewis J. Liman
500 Pearl Street, Room 701
New York, NY 10007

Grossman Enterprises LLC v. Hubbard Broadcasting, Inc. et al,
1:20-cv-03023-LJL

Dear Judge Liman:

This firm represents Defendant NYP Holdings, Inc. (“NYP”), publisher of the *New York Post*. I write to make an application on behalf of all of the Defendants in the action to adjourn the Initial Pre-trial Conference in this matter, which is currently scheduled to take place by telephone on July 24, 2020, at 11:30 a.m. The Defendants respectfully and jointly request that the Initial Pre-trial Conference be adjourned until some date be determined by the Court after August 7, 2020.¹ Plaintiff’s counsel have advised that they will consent to such an adjournment.

¹ I have conferred with the attorneys for Defendants Getty Images, Inc. (“Getty Images”), Hubbard Broadcasting, Inc. (“HBI”), ReelzChannel, LLC (“Reelz”), AMS Pictures, Inc. (“AMS”), Shutterstock,

MINTZ & GOLD LLP
ATTORNEYS AT LAW

Hon. Lewis J. Liman
July 8, 2020
Page 2 of 3

I also write to request that the Court enter an order directing that the time for Defendants to answer, move, or file a letter indicating an intention to move under Rule 12, Fed. R. Civ. P., with respect to the Complaint be adjourned from the current date of July 14, 2020, to July 28, 2020. Plaintiff has agreed to this schedule as well.

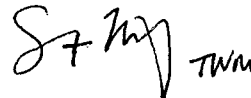
The reason for the foregoing request is that counsel have been engaged in settlement discussions and require additional time to facilitate a further voluntary disclosure of certain financial and other otherwise confidential information.

There was one previous request by letter motion for an extension of the foregoing deadlines that the Court approved and so ordered on June 1, 2020 (ECF Doc. No. 16).

Accordingly, Defendants respectfully request that the Court: (1) reschedule the Initial Pre-trial Conference, currently scheduled for July 24, 2020, to a date after August 7, 2020, such request being made upon the consent of all parties, with the understanding that a proposed Case Management Plan and Scheduling Order would be jointly submitted on or before July 31, 2020, and (2) so order that the time for all Defendants to answer, move, or file the pre-motion letter described in the Court's April 20 Order and the Court's individual rules of practice is extended until July 28, 2020. Plaintiff consents to this schedule.

Application GRANTED. The Initial Pretrial Conference previously set for July 24, 2020 is ADJOURNED to August 18, 2020 at 12:00 p.m. It will proceed telephonically. The parties are directed to call (888) 251-2909 and use access code 2123101.

Respectfully submitted,



Steven G. Mintz

No further extensions.

7/8/2020


LEWIS J. LIMAN
United States District Judge

Inc. ("Shutterstock"), Rex Features Limited ("Rex"), and Zuma Press, Inc. ("Zuma"), who have not yet appeared in the action, but who I can represent are in agreement with the proposed realignment of the dates to respond to the Complaint and to appear for the Initial Pre-trial Conference. Each attorney is copied on this letter and has consented to this letter.

MINTZ & GOLD LLP
ATTORNEYS AT LAW

Hon. Lewis J. Liman
July 8, 2020
Page 3 of 3

Cc: David Leichtman, Esq. (Via ECF)
Counsel for Plaintiff

Heather Wilde, Esq. (Via E-mail)
Counsel for Defendant Getty Images, Inc.

Eleanor M. Lackman, Esq. (Via E-mail)
Counsel for Defendants Shutterstock, Inc. and Rex Features Limited

Katherine Wright Morrone, Esq. (Via E-mail)
J. Douglas Baldrige, Esq. (Via E-mail)
*Counsel for Defendants AMS Pictures, Inc., Hubbard Broadcasting, Inc., and
ReelzChannel, LLC*

Richard P. Liebowitz, Esq. (Via E-mail)
Counsel for Zuma Press, Inc.